

WAJDA LAW GROUP, APC
 Nicholas M. Wajda (Nev. Bar No. 11480)
 871 Coronado Center Drive
 Suite 200
 Henderson, Nevada 89052
 +1 702-900-6339
 nick@wajdalawgroup.com
 Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

MARY A. HOLDEN,

Plaintiff,

v.

NATIONWIDE CAPITAL SERVICES
 d/b/a STRUCTURED SETTLEMENT,

Defendant.

Case No. 2:21-cv-00086-JCM-VCF

**STIPULATED DISCOVERY PLAN AND
 SCHEDULING ORDER**

Pursuant to Local Rule 26-1(a), MARY A. HOLDEN (“Plaintiff”) and NATIONWIDE CAPITAL SERVICES d/b/a STRUCTURED SETTLEMENT, (“Defendant”) (herein collectively the “Parties”) conducted a discovery-planning conference on March 2, 2022, by and hereby, submit the following Stipulated Discovery Plan and Scheduling Order.

1. Discovery Cut-Off	Friday, September 30, 2022
2. Joint Protective Order	Wednesday, March 30, 2022
3. Rule 26(a) Initial Disclosures	Wednesday, March 30, 2022
4. Motion to Amend Pleadings/Parties	Friday, May 6, 2022
5. Expert Designations	Monday, August 1, 2022
6. Rebuttal Expert Designations	Monday, September 5, 2022
7. Expert Discovery Cut-off	Friday, September 30, 2022
8. Dispositive Motion Deadline	Monday, October 31, 2022

Joint Pretrial Order

December 1, 2022

If dispositive motions are filed, the deadline
 for filing the joint pretrial order will be suspended until 30 days after
 decision on the dispositive motions or further court order.

2. Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.

3. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.

a. **Alternative Dispute Resolution (ADR):** The Parties certify that they have met and conferred to discuss ADR and have collectively determined that ADR will not assist in facilitating settlement at this time.

c. **Electronic Evidence:** The Parties do not anticipate discovery issues at this time and do not foresee any issues arising from the disclosure of electronically stored information. The parties agree to serve discovery requests, discovery responses, and disclosures via electronic mail. The Parties agree that .pdf will be the default

format for production of all documents. If a party requests native format, it will
be made available.

IT IS SO ORDERED:

Dated: 3-21-2022



United States Magistrate Judge

Dated: March 17, 2022

Respectfully submitted,

s/ Nicholas M. Wajda
Nicholas M. Wajda (Nev. Bar No. 11480)
WAJDA LAW GROUP, APC
871 Coronado Center Drive
Suite 200
Henderson, Nevada 89052
+1 702-900-6339
nick@wajdalawgroup.com
Attorney for the Plaintiff

s/ Cami M. Perkins
Cami M. Perkins, Esq.
Nevada Bar No. 9149
Steven E. Kish III, Esq.
Nevada Bar No. 15257
HOWARD & HOWARD ATTORNEYS
PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169
Telephone: (702) 257-1483
Email: cperkins@howardandhoward.com
Email: sek@h2law.com
Attorneys for Defendant
Nationwide Capital Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2022, I electronically filed the foregoing using the Court's Case Management/Electronic Case File (CM/ECF) system which will effectuate service on all counsel of record.

/s/ Nicholas M. Wajda
Nicholas M. Wajda